

Christine Jines
Corporate Manager-
Federal Regulatory

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 326-8879
Fax 202 408-4806

DOCKET FILE COPY ORIGINAL

ORIGINAL

EX PARTE OR LATE FILED



June 17, 1997

EX PARTE OR LATE FILED

EXPARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop Code 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED
JUN 17 1997
Federal Communications Commission
Office of Secretary

RE: CC Docket No. 96-128, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Comparably Efficient Interconnection Plan for the Provision of Basic Telephone Service

Dear Mr. Caton:

The attached letters were sent to interexchange carriers by Southwestern Bell Telephone Company notifying them of Southwestern Bell Telephone Company's satisfaction of all requirements entitling it to interim compensation due payphone service providers associated with the above referenced proceeding.

Please include these letters in the record of this proceeding in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Acknowledgment and date of receipt of this notice are requested. A duplicate copy is attached for this purpose.

Please contact me on (202) 326-8879 if you have any questions concerning this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Chris Jines".

Attachments

cc: Regina Keeney, Chief, Common Carrier Bureau (letter only)

No. of Copies rec'd 021
List ABOVE

Ronald M. Jennings
Vice President-General Manager
Opr. Svcs. & Pub. Comm.

Southwestern Bell Telephone
17330 Preston Road
Dallas, Texas 75252
Phone 972 733-7008



EX PARTE OR LATE FILED

June 4, 1997

Mr. Pres Sheppard
Vice President Law and Government Affairs
AT&T Corporation
919 Congress Ave., Ste.400
Austin, TX 78701

RECEIVED
JUN 17 1997
Federal Communications Commission
Office of Secretary

Dear Mr. Sheppard:

Southwestern Bell Telephone Company (SWBT) hereby certifies that it has met the requirements established by the Federal Communications Commission to receive compensation from carriers. These requirements are set forth in the Report and Order (September 20, 1996), the Order on Reconsideration (November 8, 1996), and subsequent orders (April 4, 1997 and April 15, 1997). Specifically, SWBT certifies the following:

1. SWBT has an effective cost accounting manual (CAM) filing regarding payphone as a nonregulated service.
2. SWBT has an effective interstate CCL tariff reflecting a reduction for deregulated payphone costs and reflecting additional multi-line subscriber line charge (SLC) revenue.
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6. SWBT has in effect intrastate tariffs for unbundled functionalities associated with those lines.
7. SWBT has in effect interstate tariffs for unbundled functionalities associated with those lines. SWBT's January 15, 1997 filing complied with the FCC requirements.
8. SWBT has an approved Comparably Efficient Interconnection (CEI) Plan for basic payphone services and unbundled functionalities.
9. SWBT's intrastate payphone service tariffs meet the "new services test" as described at 47 C.F.R. Section 61.49(g)(2). SWBT submitted data to each of its State Commissions prior to April 15, 1997.

Accordingly, SWBT is in full compliance with the requirements set forth in the FCC's Payphone Orders. It is, therefore, eligible to receive compensation from carriers as of April 15, 1997. In accordance with the FCC's Payphone Orders, carriers are required to pay flat-rate compensation until October 7, 1997, and per call compensation thereafter. SWBT's compliance with the above requirements is further detailed in the attachments to this letter. Copies of referenced orders are also attached.

Sincerely,

A handwritten signature in cursive script that reads "Ronald M. Jennings".
Ronald M. Jennings

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CC: Ms. Regina M. Keeney, Chief, Common Carrier Bureau
John Bethel, Financial Analysis-Public Utility Analyst, Arkansas Public Service Commission
Larry Walker, Telecom-Rate Analyst, Arkansas Public Service Commission
Susan Stanley, Assistant General Counsel, Kansas Corporation Commission
Randy Debenham, Sr. Telecommunications Analyst, Kansas Corporation Commission
Anthony Zerillo, Engineering Specialist, Missouri Public Service Commission
Penny Baker, Deputy Counsel, Missouri Public Service Commission
Larry Schroeder, Deputy Director Public Utilities Div., Oklahoma Corporation Commission
Cece Wood, Assistant General Counsel, Oklahoma Corporation Commission
Charles Johnson, Assistant General Counsel, Texas Public Utility Commission
Alice Nearn, Network Analyst, Texas Public Utility Commission
John Feeley, AT&T Corporation

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(1) In order DA 97-814 released April 15, 1997, the FCC found that SWBT's current Cost Allocation Manual (CAM) satisfies the requirements of the Payphone Order. Per the CAM, effective April 15, 1997, SWBT reclassified the payphone assets in Account 2351 and the associated accumulated depreciation to nonregulated activities.

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(2) Interim approval granted effective April 15, 1997 subject to refund/true-up.

Ronald M. Jennings
Vice President-General Manager
Opr. Svcs. & Pub. Comm.

Southwestern Bell Telephone
17330 Preston Road
Dallas, Texas 75252
Phone 972 733-7008



June 4, 1997

Mr. Bill Wilde
Director
Local Financial Systems Management
MCI Telecommunications Corp.
8521 Leesburg Pike
Vienna, Virginia 22182

Dear Mr. Wilde:

Southwestern Bell Telephone Company (SWBT) hereby certifies that it has met the requirements established by the Federal Communications Commission to receive compensation from carriers. These requirements are set forth in the Report and Order (September 20, 1996), the Order on Reconsideration (November 8, 1996), and subsequent orders (April 4, 1997 and April 15, 1997). Specifically, SWBT certifies the following:

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This letter is also intended to serve as SWBT's response to MCI's letter of May 15, 1997, signed by Michael Beach.

Sincerely,

A handwritten signature in cursive script that reads "Ronald M. Jennings".

Ronald M. Jennings

Attachments

CC: Ms. Regina M. Keeney, Chief, Common Carrier Bureau
John Bethel, Financial Analysis-Public Utility Analyst, Arkansas Public Service Commission
Larry Walker, Telecom-Rate Analyst, Arkansas Public Service Commission
Susan Stanley, Assistant General Counsel, Kansas Corporation Commission
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Penny Baker, Deputy Counsel, Missouri Public Service Commission
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Charles Johnson, Assistant General Counsel, Texas Public Utility Commission
Alice Nearn, Network Analyst, Texas Public Utility Commission
John Feeley, AT&T Corporation
Paula Rice, MCI Telecommunications Corp.
Les Tettenhorst, MCI Telecommunications Corp.
Michael Beach, MCI Telecommunications Corp.

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(2) Interim approval granted effective April 15, 1997 subject to refund/true-up.



June 4, 1997

Mr. Bill Mullen
Manager Network Development
MFS Intelenet, Inc.
1 Tower Lane, Ste. 1600
Oakbrook Terrace, IL 60181

Dear Mr. Mullen:

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Rick Heitmann, Associate General Counsel & Vice-President, Worldcom

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(2) Interim approval granted effective April 15, 1997 subject to refund/true-up.



June 4, 1997

Mr. Ken Melley
U S Long Distance
9311 San Pedro, Ste. 100
San Antonio, TX 78216

Dear Mr. Melley:

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June 4, 1997

Ms. Connie Mitchell
Senior Vice President Corporate & LEC Services
Vartec Telecom, Inc.
3200 W. Pleasant Run Road
Lancaster, TX 75146

Dear Ms. Mitchell:

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June 4, 1997

Mr. Josh Fox
Senior Manager
Cable & Wireless Communications, Inc.
1919 Galows Rd.
Vienna, VA 22181

Dear Mr. Fox:

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9. SWBT's intrastate payphone service tariffs meet the "new services test" as described at 47 C.F.R. Section 61.49(g)(2). SWBT submitted data to each of its State Commissions prior to April 15, 1997.

Accordingly, SWBT is in full compliance with the requirements set forth in the FCC's Payphone Orders. It is, therefore, eligible to receive compensation from carriers as of April 15, 1997. In accordance with the FCC's Payphone Orders, carriers are required to pay flat-rate compensation until October 7, 1997, and per call compensation thereafter. SWBT's compliance with the above requirements is further detailed in the attachments to this letter. Copies of referenced orders are also attached.

Sincerely,

A handwritten signature in cursive script, reading "Ronald M. Jennings".

Ronald M. Jennings

Attachments

Attachment A

INTERSTATE REQUIREMENTS

<u>REQUIREMENT</u>	<u>APPROVED/ IMPLEMENTED</u>	<u>ORDER NUMBER</u>
Cost Allocation Manual (CAM)	April 15, 1997	DA 97-814
Interstate CCL Tariff Rate Reduction	April 15, 1997	DA 97-806
Deregulation/Reclassification of Payphone CPE	April 15, 1997	DA 97-814(1)
Interstate Tariffs for Unbundled Features	April 15, 1997	DA 97-806
CEI Plan	April 15, 1997	DA 97-795

(1) In order DA 97-814 released April 15, 1997, the FCC found that SWBT's current Cost Allocation Manual (CAM) satisfies the requirements of the Payphone Order. Per the CAM, effective April 15, 1997, SWBT reclassified the payphone assets in Account 2351 and the associated accumulated depreciation to nonregulated activities.

INTRASTATE REQUIREMENTS

<u>STATE</u>	<u>TARIFFS FOR BASIC SERVICES AND UNBUNDLED FEATURES</u>	<u>SUBSIDY ISSUE ADDRESSED</u>	<u>NEW SERVICES TEST</u>	<u>DOCKET/ ORDER NUMBER</u>
ARKANSAS	Filed January 15, 1997 Effective April 15, 1997	Filed April 8, 1997	Analyses presented to Commission April 14, 1997.	Docket No. 96-014-TF(1)
KANSAS	Filed January 15, 1997 Effective April 15, 1997	Included in January 15 1997 tariff filing.	Analyses provided to Commission April 11, 1997.	Docket No. 97-SWBT-415-TAR
MISSOURI	Filed January 15, 1997 Effective April 15, 1997	Included in January 15, 1997 tariff filing.	Analyses provided to Commission April 9, 1997.	Case No. TT-97- 345
OKLAHOMA	Filed January 15, 1997, Effective April 15, 1997 (2)	Analyses presented to Commission February, 26, 1997.	Analyses provided to Commission April 14, 1997.	PUD 960000161 Order No. 411328
TEXAS	Filed January 15, 1997 Effective April 15, 1997 (2)	Included in January 15, 1997 tariff filing.	Analyses provided to Commission April 14 1997.	Docket No. 16890, Order No. 6

(1) The Docket Number shown applies to the January 15 tariff filing. The subsidy issue was included in a subsequent filing made on April 8, 1997 with an effective date of April 15, 1997. This filing was made pursuant to Section 8 of the Arkansas Telecommunications Regulatory Reform Act of 1997 and, therefore, was not assigned a docket number. Under Section 8 of the Act an electing company may "establish rates for new services by filing a tariff or a price list with the Commission. Such rates shall not require Commission approval. The tariff or price list shall be effective upon filing or at such future time as the electing company shall designate." In accordance with this statute the Arkansas PSC was not required to issue specific orders approving these filings.

(2) Interim approval granted effective April 15, 1997 subject to refund/true-up.

Ronald M. Jennings
Vice President-General Manager
Opr. Svcs. & Pub. Comm.

Southwestern Bell Telephone
17350 Preston Road
Dallas, Texas 75252
Phone 972 733-7008



June 4, 1997

Mr. Mike Malone - Senior Manager
Cost of Access
Frontier Companies
180 South Clinton Ave.
Rochester, NY 14646

Dear Mr. Malone:

Southwestern Bell Telephone Company (SWBT) hereby certifies that it has met the requirements established by the Federal Communications Commission to receive compensation from carriers. These requirements are set forth in the Report and Order (September 20, 1996), the Order on Reconsideration (November 8, 1996), and subsequent orders (April 4, 1997 and April 15, 1997). Specifically, SWBT certifies the following:

1. SWBT has an effective cost accounting manual (CAM) filing regarding payphone as a nonregulated service.
2. SWBT has an effective interstate CCL tariff reflecting a reduction for deregulated payphone costs and reflecting additional multi-line subscriber line charge (SLC) revenue.
3. SWBT has effective intrastate tariffs reflecting the removal, where necessary, of charges that recover the costs of payphones and any intrastate subsidies.
4. SWBT has reclassified to nonregulated accounts the value of payphone customer premises equipment (CPE) and related costs.
5. SWBT has in effect intrastate tariffs for basic payphone services (for "dumb" and "smart" payphones).
6. SWBT has in effect intrastate tariffs for unbundled functionalities associated with those lines.
7. SWBT has in effect interstate tariffs for unbundled functionalities associated with those lines. SWBT's January 15, 1997 filing complied with the FCC requirements.
8. SWBT has an approved Comparably Efficient Interconnection (CEI) Plan for basic payphone services and unbundled functionalities.
9. SWBT's intrastate payphone service tariffs meet the "new services test" as described at 47 C.F.R. Section 61.49(g)(2). SWBT submitted data to each of its State Commissions prior to April 15, 1997.

Accordingly, SWBT is in full compliance with the requirements set forth in the FCC's Payphone Orders. It is, therefore, eligible to receive compensation from carriers as of April 15, 1997. In accordance with the FCC's Payphone Orders, carriers are required to pay flat-rate compensation until October 7, 1997, and per call compensation thereafter. SWBT's compliance with the above requirements is further detailed in the attachments to this letter. Copies of referenced orders are also attached.

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